

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

LATANGYA JACKSON,

Plaintiff,

v.

**NATIONAL CREDIT SYSTEMS,
INC.,**

Defendant.

Civil Action No.

1:16-cv-01029-ODE-WEJ

AFFIDAVIT BY ORION G. WEBB OF ATTORNEY'S FEES

Personally appeared before the undersigned, attorney for Plaintiff, Orion G. Webb, who after being duly sworn states as follows:

1.

I, Orion G. Webb, am a resident of the state of Georgia. I am over 21 years of age and competent to testify and give this affidavit based upon my personal knowledge that the facts contained herein are true and correct.

2.

I am an attorney licensed to practice law in the state of Georgia. My Georgia Bar number is 479611 and I am currently in good standing with the State Bar of Georgia. I am an Associate with the law firm of Smith, Welch, Webb & White, LLC, and have been practicing law since October, 2014.

3.

I have litigated in the Atlanta Metropolitan Area since October, 2014 with a particular focus on consumer litigation.

4.

I have resolved numerous disputes through informal settlement, several matters through mediation, obtained multiple default judgments, and litigated ten bench and one jury trial.

5.

I have kept contemporaneous, detailed records of time spent litigating the above captioned matter.

6.

My rate is \$250.00 per hour for my time and \$105.00 per hour for Paralegal time, which is reasonable considering my education and experience. My rate in 2018 was \$225 per hour, which was reasonable considering my education and experience. My rate in 2017 was \$200 per hour for my time and \$105 per hour for Paralegal time, which was reasonable and has been approved by this Court.

7.

Attorney's fees associated with this matter total **\$4,155**. A detailed list of these transactions is included below.

Detailed Transactions

Date	Timekeeper	Rate	Hours	Amount	Transaction
9/7/2018	PA	\$105	0.15	\$15.75	Receive Motion for Attorney's Fees, Brief and Affidavit. Download and profile each Pleading to electronic case file.
9/11/2018	OGW	\$225	0.45	\$101.25	Finalize good faith letter; determine to wait three days to see if responses were mailed today, and file on the Fourth business day, September 17.
9/15/2018	OGW	\$225	0.2	\$45.00	Edit good faith letter, finalize and execute same; instructions to PA to mail and email
9/17/2018	PA	\$105	0.35	\$36.75	Receive FRCP 37(a)(1) Good Faith Discovery letter. Finalize and send correspondence via email and mailing.
9/17/2018	OGW	\$225	0.5	\$112.50	Review timing for response to Motion for Attorney's Fees; Calendar Same
9/20/2018	OGW	\$225	1.5	\$337.50	Motion to Compel; Certificate of Good Faith Effort to Confer; Brief In Support Affidavit of Attorney's Fees; Proposed Order FD CPA Claim
9/21/2018	PA	\$105	0.1	\$10.50	Reach out to opposing counsel regarding check for settlement of garnishment action

9/21/2018	OGW	\$225	1.4	\$315.00	Finalize Affidavit, Motion to Compel and supporting pleadings; file same
9/24/2018	PA	\$105	0.35	\$36.75	Receive, download, print and update electronic file with Motion to Compel and all supporting documents. File same.
9/24/2018	OGW	\$225	0.4	\$90.00	Receipt of notice of Motion for Attny's fees being sent up to judge unanswered; review file and refresh memory on where Defendant is located; Instructions to PA for Third Party discovery
9/24/2018	PA	\$105	1.6	\$168.00	Edit and finalize Non-Party Notices. Draft Rule 5.4 for each Non Party request. Prepare certified mailing and US mailing for each party. E-file each 5.4.
9/24/2018	OGW	\$225	0.5	\$112.50	Review and edit nonparty discovery requests; execute same; receipt of Fulton County response to open records request, and review same; check q-public for address associated with Defendant
9/24/2018	PA	\$105	1.5	\$157.50	Drafted Non-Party Request to Georgia Power and Fulton County Tax Commissioner, prepared Open Records Request to Fulton County for business records. Conference with Mr. Webb. Search of Clerk's Authority for any deed records.

9/26/2018	PA	\$105	0.3	\$31.50	Receive, download and print each 5.4 Certificate stamp filed by Clerk of Court
9/26/2018	PA	\$105	0.3	\$31.50	Receive and update electronic file with confirmation of open records request
9/26/2018	OGW	\$225	1	\$225.00	Motion for Writ of Execution
9/27/2018	PA	\$105	0.2	\$21.00	Receive stamp filed copy of Motion for Writ; Download, print, and profile Pleadings to electronic case file
9/27/2018	OGW	\$225	0.2	\$45.00	Inquire with opposing counsel regarding status of proposed settlement
10/4/2018	PA	\$105	2.1	\$220.50	Conference with Mr. Webb upon receipt of Georgia Power response to Non Party request. Scan and update response to electronic case file. Instruction from Mr. Webb related to Garnishment and next steps. Review BB&T Bank locations. Discuss venue for suit. Phone call to Clerk of Court regarding filing fees. Draft and submit check request with instruction. Correspond with process server regarding service. Discuss location of bank branch with Mr. Webb. Draft courier slip with instruction for filing and hand delivery

					of courtesy copy. Draft Sheriff's Entry of Service.
10/4/2018	OGW	\$225	0.5	\$112.50	Receipt and review of nonparty document production from GA Power, including voided checks; instructions to PA to draft garnishment of BB&T
10/4/2018	OGW	\$225	1.2	\$270.00	Garnishment Petition against BB&T
10/5/2018	PA	\$105	0.5	\$52.50	Receive stamp filed copies of Pleadings filed by Clerk of Court in garnishment action. Scan and update electronic file. Prepare courier slip with instruction for courier to hand deliver Garnishment action on BB&T Bank.
10/5/2018	PA	\$105	0.1	\$10.50	Receipt of returned certified green card from Fulton County Tax commissioner sent in anticipation of garnishment action; update correspondence in file with same
10/8/2018	PA	\$105	0.3	\$31.50	Review Sheriff's website to determine whether garnishee served.
10/9/2018	PA	\$105	0.2	\$21.00	Review Sheriff's website to determine whether garnishee served.
10/10/2018	OGW	\$225	0.5	\$112.50	Receipt of nonparty documents from Fulton County Tax Authority; review docs and corporate filings with Georgia

					Secretary of State to determine who Auspay 1 is in relation to NCS
10/11/2018	PA	\$105	0.3	\$31.50	Review Sheriff's website to determine whether garnishee served.
10/11/2018	PA	\$105	0.6	\$63.00	Review Sheriff's website to determine whether garnishee served. Prepare copies and certified mail to Defendant pursuant to statute; Scan and update case file with copies of mailings
10/12/2018	PA	\$105	0.6	\$63.00	Draft Notice of Service of Garnishment Upon Defendant. Prepare copies of certified and US mailing for Exhibit
10/12/2018	PA	\$105	0.4	\$42.00	Receive order regarding case and action to be taken within 60 days; Calendar same
10/12/2018	PA	\$105	0.2	\$21.00	Receive confirmation of receipt from Georgia Power. Update case file with certified mailing
10/17/2018	PA	\$105	0.3	\$31.50	Review USPS website for tracking information to National Credit Systems
10/17/2018	PA	\$105	0.3	\$31.50	Receive Sheriff's Entry of Service on BB&T; scan and update electronic case file with same. Review Clerk of Court docket for filing same
10/18/2018	PA	\$105	0.5	\$52.50	Receive instruction form Mr. Webb related to firm W-9. Send copy of same to

					MS. Olson. Receive and review Correspondence between parties related to Garnishment and Writ
10/18/2018	OGW	\$225	0.2	\$45.00	Correspondence with C Olson regarding receiving payment of judgment; discuss how to proceed with M Hanley; Send wiring instructions
10/18/2018	OGW	\$225	0.2	\$45.00	Correspondence with C Olson regarding wiring instructions
10/19/2018	PA	\$105	0.4	\$42.00	Conference with accounting to determine whether funds have been received
10/19/2018	PA	\$105	0.3	\$31.50	Receipt of notice of dismissal of garnishment
10/19/2018	OGW	\$225	0.3	\$67.50	Review payment form NCS against Judgment and garnishment; prepare pleadings to the Garnishment and Federal Court regarding same; Determine \$12.22 still owed on Judgment
10/19/2018	OGW	\$225	0.3	\$67.50	Review, edit, and finalize dismissal of garnishment
10/19/2018	OGW	\$225	0.8	\$180.00	Draft and file withdrawal of motion for Writ; send dismissal of garnishment and withdrawal of motion for writ to Defendant
10/19/2018	OGW	\$225	0.5	\$112.50	Calculate total fees due to date and send demand to Defendant
10/22/2018	PA	\$105	0.3	\$31.50	Receive stamp filed Notice of Dismissal of

					Garnishment. Download and profile; Prepare and send to Charity Olson
12/5/2018	OGW	\$225	0.1	\$22.50	Reach out to opposing counsel regarding check for settlement of garnishment action
4/8/2019	OGW	\$250	0.3	\$75.00	Reach Out to Bedard Law firm to determine whether they are representing NCS and whether there is an offer to settle post-judgment fees
4/9/2019	OGW	\$250	1	\$250.00	Attorney's Fees Affidavit for time since September 6, 2018
4/9/2019	OGW	\$250	0.5	\$125.00	Motion and Brief in Support for attorney's fees since September 6, 2018
4/10/2019	OGW	\$250	.5	\$125.00	Finalized Pleadings for Motion for additional attorney's fees
			25.3	\$4,280.00	

Further affiant sayeth not.

This 10th day of April, 2019.


Orion G. Webb
Georgia Bar No. 479611

Sworn to and subscribed before me
this 10th day of April, 2019.

